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NEW HIGH LIMITED

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NEW HIGH LIMITED, a Hong Kong
corporation,

Plaintiff,

v.

DAVID LALWANI, an individual;
SEBASTIAN MARIA SCHILDHORN, an
individual; and BLIZZARD SA, INC., a
California corporation,

Defendants.

Case No. 8:22-cv-02328-JLS-KES
Hon. Josephine L. Staton

**NOTICE OF MOTION AND
MOTION FOR DEFAULT
JUDGMENT AGAINST
DEFENDANTS SEBASTIAN
MARIA SCHILDHORN AND
BLIZZARD SA, INC.**

**[MEMORANDUM OF POINTS
AND AUTHORITIES,
DECLARATION OF LAWRENCE
J. HILTON, AND PROPOSED
JUDGMENT FILED
CONCURRENTLY HEREWITH]**

Date: January 19, 2024
Time: 10:30 a.m.
Crtrm: 8A

TO THE COURT AND ALL PARTIES:

PLEASE TAKE NOTICE that on January 19, 2024, at 10:30 a.m., or as soon thereafter as the matter may be heard before the Honorable Josephine L. Staton in Courtroom 8A of the above-entitled Court, located at the First Street Courthouse, 350 West First Street, Los Angeles, CA 90012, Plaintiff New High Limited (“Plaintiff”) will, and hereby does, move for entry of a default judgment against Defendants Sebastian Maria Schildhorn (“Schildhorn”) and Blizzard SA, Inc. (“Blizzard”) pursuant to Rule 55 of the Federal Rules of Civil Procedure and Local Rule 55-1. This motion is brought on the following grounds:

Plaintiff filed this action against Defendants for violations of the Uniform Voidable Transactions Act. Plaintiff sought and obtained approval from the Court to serve Blizzard with the Summons, Complaint and other required documents through the California Secretary of State, Plaintiff duly served Blizzard. Plaintiff sought and obtained approval from the Court to serve Schildhorn with the Summons, Complaint, and other required documents by publication, and Plaintiff duly served Schildhorn. Neither of the Defendants filed any responsive pleading, and the Clerk entered default against both Defendants. Neither of the Defendants is an infant or incompetent person, nor are they in military service or otherwise exempt under the Servicemembers Civil Relief Act.

This Motion is based on this Notice of Motion, the Memorandum of Points and Authorities and Declaration of Lawrence J. Hilton filed concurrently herewith, the pleadings and papers on file in this action, all matters of which the Court may properly take judicial notice, and on such other and further evidence as may properly be before this Court at the hearing on the motion.

Dated: December 7, 2023

ONE LLP

By: /s/ Lawrence J. Hilton

Lawrence J. Hilton

Taylor C. Foss
Attorneys for Plaintiff,
New High Limited

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